

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

VIRGINIA INNOVATION SCIENCES, INC.,)	
)	Case No. 1:16-cv-00861 (LO-MSN)
Plaintiff,)	
)	
v.)	
)	
AMAZON.COM, INC.,)	
)	
Defendant.)	
)	

**MOTION OF DEFENDANT AMAZON.COM, INC.
FOR ENTRY OF JUDGMENT PURSUANT TO FED. R. CIV. P. 54(B)**

Pursuant to Rule 54(b) of the Federal Rules of Civil Procedure, Defendant Amazon.com, Inc. (“Amazon”) respectfully moves this Court for entry of judgment of invalidity of U.S. Patent Nos. 7,899,492, 8,050,711, 8,903,451, 8,948,814, 9,118,794, 8,712,471, 9,286,853, and 9,355,611 (collectively, the “492 patent family”) and judgment in Amazon’s favor with respect to counts I through VIII of Plaintiff Virginia Innovation Sciences, Inc.’s (“VIS”) amended complaint. (Dkt. No. 59). As set forth in the accompanying Memorandum in Support of the Motion of Defendant Amazon.com, Inc. for Entry of Judgment Pursuant to Fed. R. Civ. P. 54(b), Amazon seeks entry of judgment so that Amazon is not deprived of the opportunity to participate in VIS’s pending appeal of the Court’s order in this case.

Date: February 3, 2017

Respectfully submitted,

AMAZON.COM, INC.

Of counsel:

J. David Hadden*
dhadden@fenwick.com
Saina Shamilov*

/s/ Robert A. Angle

Robert A. Angle (VSB No. 37691)
robert.angle@troutmansanders.com
Laura Anne Kuykendall (VSB No. 82318)
la.kuykendall@troutmansanders.com

sshamilov@fenwick.com
Ravi Ranganath*
rranganath@fenwick.com
FENWICK & WEST LLP
Silicon Valley Center
801 California Street
Mountain View, CA 94041
Telephone: (650) 988-8500
Facsimile: (650) 938-5200

* *Admitted Pro Hac Vice*

TROUTMAN SANDERS LLP
1001 Haxall Point
Richmond, Virginia 23219
Telephone: (804) 697-1200
Facsimile: (804) 697-1339

Mary C. Zinsner (VSB No. 31397)
mary.zinsner@troutmansanders.com
TROUTMAN SANDERS LLP
1850 Towers Crescent Plaza, Suite 500
Tysons Corner, Virginia 22182
Telephone: (703) 734-4334
Facsimile: (703) 734-4340

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of February, 2017, I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF System, which will then send a notification of such filing (NEF) to the following:

Walter DeKalb Kelley, Jr.
Kristen Marie Ward
Hausfeld LLP
1700 K Street NW, Suite 650
Washington, DC 20006
(202) 540-7200
Facsimile: (202) 540-7201
wkelly@hausfeld.com
kward@hausfeldllp.com

William Eugene Bradley
Michael Best & Friedrich LLP
601 Pennsylvania Ave NW
Suite 700 South
Washington, DC 20004
(202) 747-9560
Facsimile: (202) 347-1819
webradley@michaelbest.com

Counsel for Plaintiff Virginia Innovation Sciences, Inc.

/s/ Robert A. Angle

Robert A. Angle (VSB No. 37691)
robert.angle@troutmansanders.com
TROUTMAN SANDERS LLP
1001 Haxall Point
Richmond, Virginia 23219
Telephone: (804) 697-1200
Facsimile: (804) 697-1339

Counsel for Defendant Amazon.com, Inc.